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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,

Case No. 3:22-cr-00380-AN

Plaintiff,

v.

**DEFENDANT’S SENTENCING
MEMORANDUM**

ALBERT WAYNE JOHNSON,

Defendant.

Albert Johnson will appear before the Court on May 15, 2024, to be sentenced for one count of transporting minors across state lines with the intent to engage in sexual activity, 18 U.S.C. § 2423(a). The offense involved two 15-year-old victims, but no force or coercion. Although the parties dispute the final guideline range, the parties have agreed that the court should impose a sentence in the range of 135 to 151 months. Mr. Johnson will ask the Court to impose a sentence of 135 months, which reflects a mid-range, within-guideline sentence if the Court adopts the defendant’s view of the guidelines, or a 4-level variance if the Court adopts the government’s view of the guidelines.

Whatever the guidelines range, a 135-month sentence of imprisonment with ten years of supervised release is warranted based on all the relevant sentencing factors under 18 U.S.C. § 3553(a). That sentence is sufficient, but not greater than necessary, to serve the purposes of punishment.

Respectfully submitted this 9th day of May, 2024.

/s/ Elizabeth G. Daily

Elizabeth G. Daily
Attorney for Defendant